

Exhibit 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, et  
al., Case No. 17-OP-45004

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132

The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of

SHANE BARKER

November 28, 2018

9:03 a.m.

Taken at:

Sheraton Suites Akron
1989 Front Street - Summit Room
Cuyahoga Falls, Ohio

Stephen J. DeBacco, RPR

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1 we're starting to see more pills on the road.

2 Q. When you say pills, what particular
3 types of pills are you referencing?

4 A. Oxycodone seems to be one always
5 sticking out in my mind, and we talked about
6 the burglaries and that type of stuff.

7 Q. Where would we look to identify
8 events involving oxycodone during this period,
9 2007 to 2008, that you've just referenced?

10 MR. LEDLIE: Object to the form of
11 the question.

12 You can answer.

13 A. Not real sure where you could look
14 other than going through our incident reports
15 from that time frame.

16 Q. Are there any other pills, other
17 than oxycodone, that you recall encountering
18 during this time period?

19 A. I don't have any recollection of
20 other than that.

21 Q. What was the nature of the law
22 enforcement encounters involving oxycodone
23 during this period, 2008 to 2009?

24 MR. LEDLIE: Object to the form of
25 the question.

1 A. We were starting to see pills that
2 were being stolen, started to see more of that
3 on -- when I was assigned to the patrol
4 division as a lieutenant.

5 Q. From what sources were pills -- and
6 I believe you mean oxycodone -- being stolen?

7 A. They would get them from family
8 members. They would steal them in the course
9 of a -- of a burglary, from pharmacies, things
10 were being taken. A variety of places where
11 people would try to dig up the pills.

12 Q. Were you personally involved in
13 investigating the reasons for an increase in
14 the number of law enforcement encounters
15 involving oxycodone during this period, 2008 to
16 2009?

17 A. No, that wouldn't have been my
18 assignment. It was to supervise the ongoing
19 situation on the road at the time.

20 Q. Do you know if the Summit County
21 Sheriff's Department undertook any efforts to
22 investigate the reasons for the increase in the
23 number of law enforcement encounters involving
24 oxycodone during this period, 2008 to 2009?

25 MR. LEDLIE: Object to the form of